

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

KIMBERLY LAFAVE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No: 1:23-cv-01605-CMH-JFA
)	
THE COUNTY OF FAIRFAX, VIRGINIA,)	
et al.,)	
)	
Defendants.)	

NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiffs, Kimberly LaFave, Glenn M. Taubman, and Robert Holzhauer, hereby notify the Court of the following supplemental authority. Plaintiffs cited *Antonyuk v. Hochul*, 639 F.Supp.3d 232, 322-23 (N.D. N.Y. 2022), for its finding that plaintiffs therein were likely to prevail in their argument that a ban on firearms in public parks violates the Second Amendment. See Memorandum in Support of Plaintiffs’ Motion for Preliminary Injunction 11-12, 15, 18. That part of the decision was reversed in *Antonyuk v. Chiumento*, 2023 WL 8518003 at *59 (2nd Cir. Dec. 8, 2023), which stated that the restriction “is within the Nation’s history of regulating firearms in quintessentially crowded areas and public forums, at least insofar as the regulation prohibits firearms in *urban* parks, though not necessarily as to *rural* parks.” Plaintiffs will address this matter further in their reply brief.

Respectfully Submitted,

Kimberly LaFave
Glenn M. Taubman
Robert Holzhauer,
Plaintiffs

By Counsel

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CERTIFICATE OF SERVICE

I certify that the foregoing was served via ECF on all counsel of record in this case on Dec. 14, 2023.

_____/s/_____
Trey Mayfield